

August 7, 2024

Via ECF

The Honorable Frederick J. Scullin, Jr.
Senior United States District Court Judge
United States District Court for the
Northern District of New York
100 S. Clinton St.
Syracuse, NY 13261

Re: Joint Status Update Letter by All Parties in
DeAnna LeTray v. Jefferson County et al., Case No. 20-cv-01194

Dear Judge Scullin:

In response to the Court's Text Order on July 19, 2024, in the above-referenced case, all parties write jointly in advance of the telephonic court conference scheduled for this Friday, August 9 at 1:00 p.m. to update the Court on the status of settlement.

The Plaintiff and City of Watertown Defendants have reached and signed a settlement agreement. The City of Watertown has promulgated an agreed-upon policy and delivered a settlement payment to the Plaintiff. The parties' proposed Stipulation and Order of Dismissal regarding the Watertown Defendants is forthcoming.

The Plaintiff and Jefferson County Defendants have reached a settlement in principle where they have agreed upon a monetary amount and that Jefferson County will adopt certain policies and training. The parties remain confident that a resolution will be reached. Since the parties' last status update to the Court,¹ Plaintiff's counsel on July 22 provided limited feedback to the draft policy Jefferson County Defendants had provided on July 18. On July 23, Counsel for both parties had a productive meeting to discuss the draft policy in detail. Since that meeting, Jefferson County has not provided a written response to the draft settlement agreement or to Plaintiff's feedback on the draft policy. On July 31, Plaintiff's counsel requested an update from Jefferson County. On August 6, Counsel for Jefferson County Kayla Arias informed Plaintiff's counsel that Ms. Arias has a meeting scheduled with the Sheriff, Undersheriff, and County Attorney on Thursday morning (August 8) to discuss the draft settlement agreement and draft policy and has agreed to provide a written update to and meet with Plaintiff's counsel that afternoon. Plaintiff's counsel has agreed to that meeting and has further offered to join any future meetings.

¹ Plaintiff's counsel had previously provided Jefferson County Defendants' Counsel with a draft settlement agreement on June 28 and draft policy and training language on July 2. On July 18, Jefferson County Defendants' counsel provided Plaintiff's counsel with a draft policy. *See* ECF No. 163.

While Jefferson County's counsel has proposed a three-week adjournment of Friday's conference, it is Plaintiff's counsel's position that the status conference remains a helpful tool to avoid further delay. Plaintiff would be willing to adjourn the conference if Jefferson County Defendants would agree to a series of set interim deadlines by which the parties would exchange written drafts of the proposed policy and settlement agreement to avoid any additional delays, but as of the date of this letter, Jefferson County has not agreed to any interim deadlines going forward. Accordingly, Plaintiff's counsel believes that a court conference would be productive to ensure a timely resolution of this matter.

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Respectfully submitted,

/s/ Jessica Perry

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